



RSPB Eastern England
65, Stalham House
Thorpe Road
Norwich
Norfolk
NR1 1UD

Mr Paul Sexton
Planning and Sustainable Communities
South Cambridgeshire District Council
South Cambridgeshire Hall
Cambourne Business Park
Cambourne
Cambridge
CB23 6EA

19 April 2010

Dear Mr Sexton,

Re: Heydon Grange Wind Farm Development - Request For Scoping Opinion

Thank you for providing the RSPB with the opportunity to submit comments on the Environmental Impact Assessment Scoping Report (the **Report**) for the above proposal, and for granting an extension to the deadline for response.

Our comments are outlined below, with further detail on expected survey methods provided in an annex to this letter. However, please note that without sight of the full survey methodology employed and results of the walk over surveys of the site conducted to date, our comments are necessarily general in nature at this stage.

Background

We understand that Volkswind UK Ltd is proposing to construct and operate a wind farm comprising a maximum of 11 turbines and associated infrastructure on land to the north of the village of Heydon, Cambridgeshire.

The RSPB's position on wind technologies

The RSPB is supportive of renewable energy projects providing that adverse impacts upon wildlife are avoided by appropriate siting and design. Renewables offer an opportunity to modify or reverse the deleterious changes associated with climate change arising from an over-reliance upon fossil fuels.

The available evidence suggests that wind farms can pose three main problems for birds: disturbance, habitat loss or damage, and collision. Birds may be displaced by construction noise, vehicle movements, or the presence of operating turbines. The wind farm itself may physically destroy bird's

feeding, breeding or roosting sites. In addition, birds may fly into the turbine tower or blades and be killed or injured; storms or conditions of poor visibility will increase the likelihood of this occurring.

Nature conservation interests

The proposed development site at Heydon is approximately 3.5km to the south of Fowlmere Watercress Beds Site of Special Scientific Interest (SSSI), and RSPB nature reserve. Fowlmere supports a variety of habitats, ranging from open shallow water, extensive areas of tall fen, willow carr and, on higher ground, chalk grassland and scattered scrub. This variety supports a rich bird life, for which the site is *inter alia* notified.

Environmental Impact Assessment (EIA)

The RSPB considers that a comprehensive EIA must be prepared in support of this proposal in order to fully assess all likely impacts on natural heritage. The RSPB would expect thorough ornithological surveys to be conducted as part of this, and information on the following areas to be presented in the Environmental Statement:

1. Definition of a suitable study area.
2. An assessment of statutorily protected nature conservation sites in the wider vicinity of the proposal.
3. A survey of breeding birds on the site.
4. A survey of wintering and passage birds using the site.
5. A conservation evaluation of 3. and 4. above (i.e., an assessment of the significance of the species recorded).
6. An assessment of the following effects on birds:
 - direct habitat loss,
 - collision risks,
 - indirect habitat loss.
7. Proposed mitigation of impacts.
8. A proposal for post-construction monitoring.

The RSPB expects ornithological surveys conducted to be in accordance with the guidance produced by Scottish Natural Heritage (SNH)², and the survey methods outlined by Gilbert *et al.*³. It should be noted that the SNH guidelines form minimum standards, which the ornithological surveys should adhere to. Surveys should record flight paths and flight height, to inform collision risk modelling and assessment, with appropriately defined avoidance rates employed.

We note that the ecological assessment of the EIA will include consideration of mitigation of adverse effects identified, as well as measures for ecological enhancement of the site (page 27). The RSPB recommends that the Environmental Statement (ES) includes a detailed account of proposed mitigation and biodiversity enhancement measures, alongside recognition of the need for the proposed package of measures to be agreed by the relevant bodies (e.g. Natural England, RSPB), before any consent is granted.

In this respect, while no details on numbers or status are provided in the Report, it is encouraging to note corn bunting and tree sparrow (as well as other passerines of conservation concern) have been recorded during initial walkover surveys. These species in particular have suffered considerable declines and are currently the focus for agri-environment funding. We suggest that consideration be

¹ As designated under the Wildlife and Countryside Act 1981 (as amended).

² SNH (2005) Bird survey methods for use in assessing the impacts of onshore wind farms on bird communities

³ Gilbert, G., Gibbons, D.W. & Evans, J., 1998. Bird Monitoring Methods: a manual of techniques for key UK species. RSPB/BTO/WWT/JNCC/ITE/The Seabird Group. RSPB, Sandy, Beds.

given to the provision of suitable enhancement measures for farmland birds of conservation concern. A suitable package for consideration is provided in the annex to this letter.

Cumulative impact assessment

We note that the Report provides an account of the cumulative impact assessment to be conducted in respect of landscape and visual impacts (page 10). However, no account is given of any cumulative impact assessment with respect to nature conservation interests. The RSPB expects Environmental Impact Assessments to include an assessment of the in-combination and cumulative impacts of wind energy developments with other projects that have been developed in, or are planned for, the area surrounding the proposal site. This is a requirement of the EIA Regulations (Town and Country Planning (Environmental Impact Assessment) (England) (Amendment) Regulations).

Additional comments

We note that page two of the Report provides an approximate grid reference for the centre of the site of TL337751. This grid reference relates to an area near Bluntisham, Huntingdonshire, which is some 30km North West of Heydon site (as depicted by Figure 1 of the Report). We have assumed this to be an error, and highlight it here to prevent its replication in any subsequent Environmental Statement prepared in support of the proposal.

We trust that the comments provided are of use. Please do not hesitate to contact me should you have any queries.

Yours sincerely,

A large black rectangular redaction box covering the signature area.

Amy Crossley
Conservation Policy Officer
RSPB Eastern England

Annex to RSPB comments on the Heydon Grange proposed Wind Farm Development

Potentially sensitive bird groups

1. Wildfowl

Wildfowl species are particularly susceptible to collision with wind turbines due to their large body mass and low manoeuvrability. Wildfowl generally roost and forage in different locations and are known to fly tens of kilometres to feed. Geese and swans tend to be most active at dusk and dawn when visibility is low and the chance of collision with stationary objects is higher. Where applicable, an EIA should fully assess the risk to these species, and be informed by vantage point surveys as appropriate.

2. Waders

Waders can also be affected by the construction and operation of wind turbines. It is thought the most significant effects occur as a result of indirect habitat loss, caused by a displacement of birds from feeding or roosting locations. Species listed in Annex 1 of the Birds Directive⁴ include golden plovers, dunlins and bar-tailed godwits. These all appear in the UK in internationally important numbers during winter.

3. Raptors and crepuscular species

We note that five species of raptor have been recorded by initial surveys (although two species were represented by only one record to date). We also note that woodland habitat and hedgerows are present at the site, which will likely be attractive to raptors and/or crepuscular species.

Raptors are known to be susceptible to collision with wind turbines. Eastern England supports significant populations of marsh harriers; a species are on Annex 1 of the Birds Directive. Raptors are particularly at risk of collision when performing aerial display flights during the breeding season; newly fledged birds are more likely to come within turbine blade height due to their inexperience. We would expect surveys to be conducted at dusk and dawn to detect any crepuscular species, particularly owls, and other night-flying species, using the area.

Barn owl

Barn owls are protected under Schedule 1 of the Wildlife and Countryside Act 1981 (as amended). The RSPB recommends that detailed monitoring work be carried out to assess the likely impact of the proposed development upon breeding barn owl within the vicinity of the site. Barn owl surveys should be conducted outside the wind turbine site as well as within, to a distance of at least 1 km, and should include monitoring at dawn and dusk. A minimum of 48 hours of observation, year round, is recommended for barn owl surveying.

4. Lowland/farmland species

The RSPB consider it likely that the area around the proposal site supports a potentially significant population of farmland birds, as the area is identified by the Bird Conservation Targeting Project⁵ as

⁴ EC Directive on the Conservation of Wild Birds 79/409 EEC (the 'Birds Directive').

⁵ http://www.rspb.org.uk/Images/BCTP2009ArableAssemblageEastOfEngland_tcm9-199615.pdf

supporting a number of key range restricted arable species of farmland conservation concern, which are the focus for agri-environment funding.

Survey requirements for farmland birds

The SNH guidelines for this group suggests that a modified Common Bird Census (CBC) style survey is most appropriate for smaller areas and providing the best information for assessing wind turbines. The RSPB advises that the modified CBC survey should also include April, and should cover a minimum of three visits. Surveys should start early in the morning, preferably from dawn or shortly after, with at least one visit at dusk to assess the site use by nocturnal species. Surveys should take place at different times of day, including dawn and dusk, and should extend to 500m outside the proposed site, as set out in the SNH guidance.

Mitigating the effect of development on farmland birds

Recently, areas that support high numbers of farmland birds within the Eastern England region have been affected by a range of developments, especially wind farms. While the RSPB accepts that the main impact of such developments on farmland bird species is displacement (although corn bunting has been recorded as a fatality in a recent post-construction monitoring report), this may result in poorer quality sites being used. Overall this could reduce breeding densities and affect breeding productivity.

The RSPB has been working hard to understand and reduce the declines in many farmland bird species, with the ultimate aim of increasing populations at local levels and restoring these species to areas where they have been lost. The impact of new development, however, could act to undermine this work. The following guidance produced by Natural England, RSPB, FWAG, GWCT, The Wildlife Farming Company, NFU and CLA could help mitigate for development, and ensure that projects contribute to BAP targets and conservation measures for farmland birds.

The Farmland Bird Package for English arable and mixed farmers

For the first time, all of the farmland bird research has been pulled together to develop a minimum package that arable and mixed farmers could use to reverse the declines of farmland birds and mitigate for effects from development on farmland birds (wind farms etc). The package, per 100 ha of arable farmland, is as follows:

1. Wild Bird Seed Mixture on 2 hectares or Over-wintered Stubble on 5 hectares (10 hectares of stubble would be required if either a pre-harvest desiccant or post-harvest herbicide is used), or a combination of the two (e.g. 1 per cent seed mixture and 2.5 per cent stubbles)
2. 20 skylark plots in winter cereals, or a fallow plot or over winter stubble followed with a summer fallow on 1 hectare
3. 1 hectare used to create a network of insect-rich habitats across the farm using one or more of the following options:
 - Unfertilised conservation headlands
 - Unharvested conservation headlands
 - Uncropped cultivated margins
 - Nectar flower mixtures